

Planning Department,
Waterford City and County Council,
Menapia Building,
The Mall,
Waterford City.
X91 FXN4.

7th March 2023

Re: Pre-Draft Issues Paper, Dungarvan-Ballinroad Local Area Plan 2024-2030

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the *Dungarvan-Ballinroad Local Area Plan Issues Paper* and submits the following observations for consideration.

Guiding Principles

The NTA recommends that the preparation of the Local Area Plan (LAP) should be guided by, and should include, land use policies and objectives that support the consolidation of urban-generated development within existing urban areas, in complement with the integration of land use and transport planning, as follows:

- The development of Dungarvan-Ballinroad should be based on the "Avoid-Shift-Improve" principle; the "Decide and Provide" approach to the planning and design of transport networks; and the general objectives of the 10-minute town concept;
- In accordance with the *National Planning Framework* (NPF) and the *Regional Spatial and Economic Strategy* (RSES), development patterns which seek to consolidate development should be supported and prioritised as a means of preventing urban sprawl, reducing the demand for long-distance travel and maximising the use of existing transport infrastructure and services;
- The location of development should be guided by the 'sequential approach' whereby development is located within the town core in the first instance and on lands where the resulting travel demand can be met by walking, cycling and public transport;
- Major new 'out-of-town' retail developments should not be supported;
- Trip intensive development, such as large-scale office developments, should not be supported at more peripheral and / or less accessible locations;

- Land use policies which seek to provide for an appropriate mix of uses at the district and neighbourhood level should be supported;
- The LAP should ensure that the road and street networks in new development areas are designed on the basis of providing for filtered permeability, and should incorporate measures which deliver filtered permeability in existing neighbourhoods;
- The LAP should ensure that access by walking, cycling and public transport is a key determinant in the location of local services such as schools, retail and leisure facilities;
- Planning for local services should ensure that the detailed design is undertaken in a manner that maximises the priority for pedestrians and cyclists. Access, footpaths, cycle parking and car parking (if required) should all be arranged so as to eliminate, as far as practicable, interference and conflict between pedestrians, cyclists and motorists;
- Where car parking is provided, it should be located and designed in a manner that reduces the potential for safety hazards and to reduce the visual dominance of cars within the environment and on the streetscape around local service centres;
- Set down or drop-off areas are not encouraged in close proximity to schools, unless there is no safe alternative area, including on the public road, within a short walk where cars can park safely and with a footpath link to the school; and
- Planning applications for new schools or the expansion of existing schools should only be supported where it has been demonstrated that the road network in the vicinity of the proposed development facilitates, or is planned to facilitate, safe and convenient walking and cycling access to the school.

Road User Hierarchy

The *National Sustainable Mobility Policy* (NSMP) sets out a strategic framework to 2030 for active travel and public transport to support Ireland's overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade. The NSMP sets out to deliver at least 500,000 additional daily active travel and public transport journeys and a 10% reduction in kilometres driven by fossil fuelled cars by 2030.

The *National Investment Framework for Transport in Ireland* (NIFTI) is the strategic framework for future investment decision making in land transport. It will guide transport investment in the years ahead to enable the NPF, support the Climate Action Plan, and promote positive social, environmental and economic outcomes throughout Ireland. NIFTI sets out the road user modal hierarchy in Ireland as: *1. Active Travel (Walking & Cycling); 2. Public Transport; 3. Private Vehicles*. It also outlines an intervention hierarchy, which is: 1. Maintain; 2. Optimise; 3. Improve; 4. New.

The LAP should align with these national policy documents and should seek the reallocation of road space in appropriate locations in accordance with the road user hierarchy, in order to prioritise walking, cycling and public transport use and prioritise the place-making functions of the urban street network.

Climate Action Plan

Under the Climate Action and Low Carbon Development (Amendment) Act 2021, emissions must reduce by 51% by 2030, setting a path towards a zero net-emissions scenario by 2050. The transport sector is committed to meeting those targets in full. For transport, there are three main actions required that should inform the policies, objectives and measures of the LAP, namely:

- Reducing the demand for travel;
- Increasing use of public transport, walking and cycling and a reduction in trips by car;
- Conversion of the transport fleet to zero emissions vehicles.

Movement at Settlement Level – Local Transport Plans (LTP)

RPO 157 of the Southern Assembly's RSES requires the preparation of Local Transport Plans for designated Key Towns, including Dungarvan-Ballinroad, based on the Area Based Transport Assessment (ABTA) guidance produced by the NTA and TII. Furthermore, in its submissions during the preparation of the current County Development Plan, the NTA recommended that LTPs should be prepared for all settlements for which an LAP is required. This recommendation was reflected in Policy Objective Trans 04 in the adopted Plan, which states 'It is a Policy Objective to prepare Local Transport Plans (LTPs) (using the Area Based Transport Assessments (ABTAs) method) in tandem with the preparation of Local Area Plans (LAPs)'. In addition, PO Trans 04 states that 'The Council will prepare LAPs and LTPs for Dungarvan and Tramore within one year of adoption of the Development Plan.' While a number of critical transport matters are highlighted in the Issues Paper document, the NTA notes that the preparation of an LTP using the ABTA methodology is not specifically referenced.

The LTP represents the lowest tier of the NPF's framework for the integration of land use and transport planning, and the achievement of compact smart growth. The purpose of the LTP is to ensure that the assessment of transport demand and its associated impact plays a central role in informing future development proposals, to support a shift to sustainable modes based on the road user hierarchy and to set a framework for investment in transport infrastructure within the town to support this.

It is intended that LTPs would:

- Maximise the opportunities for the integration of land use and transport planning;
- Assess the existing traffic, transport and movement conditions within the Plan area and in its wider context;
- Plan for the efficient movement of people, goods and services within, to and from the Plan area;
- Identify the extent to which estimated transport demand associated with local development objectives can be supported and managed on the basis of existing transport assets; and
- Identify the transport interventions required within the Plan area and in the wider context, to effectively accommodate the anticipated increase in demand.

The NTA therefore recommends that an LTP should be prepared in tandem with the Draft LAP, and is available to liaise with the Council in this regard.

Movement at Inter-Settlement level

There is an opportunity to explore the commuting patterns to and from Dungarvan-Ballinroad as part of the LTP. This may help to identify the transport infrastructure and services that are required to serve the town. The commuting profiling can be used to better understand the relationship between current land use patterns and associated travel patterns. In doing so, it can also usefully inform both the formulation of land use policies that can bring about more sustainable travel pattern outcomes, as well as the transport infrastructure and services need to meet future inter-settlement travel demand.

Walking and Cycling

In order to realise the required modal shift to sustainable modes, the appropriate policies and objectives need to be carried through at a local level where specific measures can be identified. The

LTP, following the ABTA process, would focus on the identification of the required networks and measures to bring about improvements for sustainable modes. The LTP should identify the weaknesses in the walking and cycling networks in the town and the measures required to provide safe and efficient routes from origin (housing) to destination (school, work and services). The LTP can identify measures such as filtered permeability, junction improvements, and footpath and cycle track upgrades required.

At a national level, several funding streams have been announced which specifically target improvements in the built environment for walking, cycling and other public realm measures, which will assist with the realisation of the measures that could be identified as part of the LTP. The NTA will continue to work with the local authorities on foot of the LTPs to bring identified measures to fruition through appropriate funding mechanisms. One such funding stream is the Safe Routes to Schools programme, which aims to make the journey to school by sustainable modes a safe and attractive choice for students and their parents. The importance of the journey to school and enabling this journey to be completed by walking and cycling should be a key priority for the LTP and LAP.

In 2022, the NTA issued its draft CycleConnects programme for public consultation. This proposes a network of cycle routes nationwide, including within towns. While this network remains in Draft and is subject to further refinement, it is recommended that the LAP and proposed LTP, in developing a town cycle network, should be cognisant of the draft network and its proposals as they relate to Dungarvan-Ballinroad.

Provision of Public Transport Services in Rural Areas

Dungarvan-Ballinroad will continue to be a large draw for the rural hinterland and neighbouring towns. The *Connecting Ireland: Rural Mobility Plan* is a major national public transport initiative that will increase connectivity, particularly for people living outside the major cities. The plan aims to improve mobility in rural areas. It will provide better connections between villages and towns by linking these with an enhanced regional network connecting cities and regional centres nationwide. Connecting Ireland will seek to improve the current transport network by:

- Enhancing existing services;
- Adding new services and;
- Enhancing the current Demand Responsive Transport (DRT) network.

The NTA continues to provide rural transport services through the Local Link Rural Transport Programme. The key priorities of this programme continue to be directed at addressing rural social exclusion and the integration of rural transport services with other public transport services. The programme mission statement is ‘to provide a quality nationwide community-based public transport system in rural Ireland which responds to local needs’.

The NTA will develop and expand the Local Link Rural Transport Programme in the following manner:

- seek further integration with other public transport services, including HSE and school transport;
- ensure fully accessible vehicles operate on all services;
- enhance the customer experience;
- increase patronage among children and young people; and
- encourage innovation in the service.

It is recommended that the LAP acknowledge the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns. Policies and objectives to support the role of rural transport, in particular, the Connecting Ireland plan should be included in the LAP.

Accessibility

The *National Planning Framework* recognises that social inclusion can be improved in the transport sector through, among other things, universal design. For example, *Technical Guidance Document M of the Building Control Regulations 2010* includes the objective to provide independently accessible means of approach to buildings.

Enabling universal access and facilitating and promoting universal design should be a key consideration in the LAP, as it relates to transport policies and objectives. Making the external built environment accessible to all can facilitate and promote the greater use of public transport, walking and cycling. The use of universal design in the external built environment can benefit all within society including those with specific mobility issues and requirements. Objectives which promote universal design in the external built environment, such as providing separate pedestrian entrances, the provision of dropped curbs and tactile paving, will provide a safer and more attractive environment for all.

Strategic Road Network

The NPF sets out the importance of maintaining, improving and protecting the strategic function of the key transport corridors including the need to improve and protect the strategic function of the TEN-T core and comprehensive networks.

In this regard, National Policy Objective 74 seeks to 'Secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes'. National Strategic Outcome 2 of the National Planning Framework indicates the need for 'Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements'.

In order to protect the strategic transport function of the national roads, including motorways, the NTA recommends that development objectives should accord with the DOECLG *Spatial Planning and National Roads Guidelines* (2012), and that this should be referenced in the LAP.

This is of particular relevance to Dungarvan-Ballinroad, where the N25 national primary route is located in close proximity to the town centre. Whilst the location and functions of this road may therefore present particular challenges for the development of active travel and sustainable transport measures within the town, the function of the N25 in accommodating strategic traffic, including the movement of goods vehicles will nonetheless need to be safeguarded. As noted above, an LTP would represent the most appropriate means to assess, in a holistic manner, potential options and their impacts on the road network.

Traffic management

The LTP, in informing the preparation of the LAP, should also consider traffic management within Dungarvan-Ballinroad, with the objective of ensuring that the movement of people by public transport, walking and cycling, and the movement of goods, is not adversely affected by private car traffic, and that the impacts of traffic congestion can be managed.

In particular, this should include an analysis of car parking provision within the town and the inclusion of objectives and measures to manage car parking, which is a key determinant of the likelihood of someone using a car. This should include the following:

- review of on-street parking with a view to its reallocation to other modes;
- the use of parking charges to ensure spaces are turned over regularly rather than being used by commuters;
- a review of the access arrangements to car parks with a view to improving the efficiency of the transport networks within the town.

National Transport Authority Guidance Documents

The NTA recommends that the preparation of the LAP is informed by the following NTA guidance, available on the NTA website:

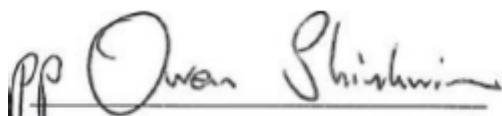
- The National Cycle Manual;
- Permeability: A Best Practice Guide;
- Achieving Effective Workplace Travel Plans: Guidance for Local Authorities;
- Workplace Travel Plans: A Guide for Implementers;
- Toolkit for School Travel; and
- Guidance Note and Pilot Methodology on Area Based Transport Assessment (NTA and TII).

Indicators – Mode Share

It is recommended that consideration is given at the LAP level to the inclusion of sustainable transport indicators, including mode share, for the purpose of monitoring the effectiveness of policies and development objectives. The NTA would be happy to work with Waterford City & County Council on the development and analysis of sustainable transport indicators, in conjunction with the Office of the Planning Regulator.

I trust that the views of the NTA will be taken into consideration in the preparation of the Draft Dungarvan-Ballinroad Local Area Plan. The NTA is available to discuss issues arising from the comments set out above, if required.

Yours sincerely,


Michael MacAree
Head of Strategic Planning